



Interstate Medical Licensure Compact

March 31, 2020

For Immediate Release

The Interstate Medical Licensure Compact Commission (IMLCC) has been and will continue to assist physicians and member boards in using the compact for the purpose of obtaining licenses. Several questions have been raised regarding the impact of some of the emergency provisions and actions by state's governors and legislatures.

The IMLCC offers the following advice and has provided this information to the member boards:

1. **Fingerprint based background check.** The IMLCC statute does not have provisions that would allow for waivers of the IMLCC statutory requirements, nor does it provide emergency powers that would authorize such waivers, including those which require that a fingerprint-based background check be conducted in order to issue a Letter of Qualification. The result is that if a member board is unable to perform all required reviews, including performing a criminal background check, then that member board may not issue a Letter of Qualification until the reviews have been satisfactorily completed. Please reference IMLCC Statute, Section 5, paragraph(b)(2).
2. **Extension of expiration dates, and change in scope of practice.** The IMLCC statute is clear that once the license has been issued using the IMLCC process, it is to be treated the same as other full, unrestricted licenses issued by that member board. The result is that a governor or legislative emergency action to extend or eliminate renewal dates applies to licenses issued using either the traditional or IMLCC process. The same applies to changes in scope of practice, like changing telemedicine restrictions or requirements. Please reference IMLCC Statute, Section 5, paragraph (d) and (e).

Resources available to obtain fingerprints vary widely and the final determination regarding the acceptance of fingerprint information resides solely with each state's Federal Criminal History Record Information (CHRI) provider. The IMLCC would recommend that physicians having difficulty in locating a source to obtain the required fingerprints contact their local police or sheriff's office to determine if assistance can be provided during this emergency situation. Several member boards have established sites that can be used to obtain fingerprints and should be contacted directly to determine if this option is available. The IMLCC has confirmed that the fee for service organizations below may be able to assist, but must be contacted directly to confirm availability:

- Identogo is available in select locations that can be found at identogo.com
- Certifix Livescan is available in select locations that can be found at certifixeivescan.com
- UPS Stores at select locations that can be found at theupsstore.com

For more information contact Marschall Smith, Executive Director at imlccexecutivedirector@imlcc.net